

3033704-LRB/SJC

I.D. 6286111

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRIAN HORN and ANDREA HORN,)	
)	
Plaintiffs,)	
v.)	No.
)	
JACK COOPER TRANSPORT)	
COMPANY, INC.,)	
)	
Defendant.)	

**DEFENDANT, JACK COOPER TRANSPORT COMPANY, INC.'S
EXHIBITS A THROUGH D TO ITS NOTICE OF REMOVAL**

NAVIGATION

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Jack Cooper

Transport

1100 Walnut Street

Suite 2400

Kansas City, MO 64106

Jack Cooper Logistics

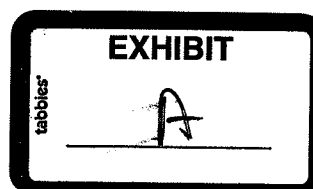
630 Kennesaw Due West Road

Kennesaw, GA 30152

About Jack Cooper

Jack Cooper is a specialty transportation and other logistics provider and the largest over-the-road finished vehicle logistics company in North America. The Company provides premium asset-heavy and asset-light based solutions to the global new and previously-owned vehicle markets, specializing in finished vehicle transportation and other logistics services for major automotive original equipment manufacturers and for fleet ownership companies, remarketers, dealers and auctions.

<https://www.jackcooper.com/contact/locations>



6/12/17

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Entity Details**THIS IS NOT A STATEMENT OF GOOD STANDING**

File Number: 368727 **Incorporation Date /** 1/26/1939
Formation Date: (mm/dd/yyyy)
Entity Name: JACK COOPER TRANSPORT COMPANY, INC.
Entity Kind: Corporation **Entity Type:** General
Residency: Domestic **State:** DELAWARE

REGISTERED AGENT INFORMATION

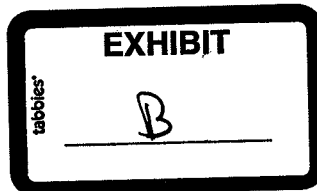
Name: CORPORATION SERVICE COMPANY
Address: 2711 CENTERVILLE RD SUITE 400
City: WILMINGTON **County:** New Castle
State: DE **Postal Code:** 19808
Phone: 302-636-5401

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

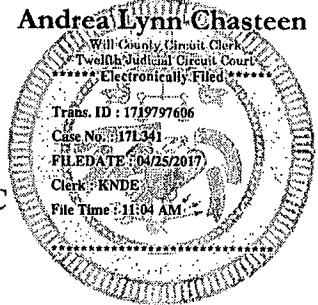
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2017L000341



**IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRC
WILL COUNTY, ILLINOIS**

BRIAN HORN and ANDREA HORN,)
Plaintiff,)

vs.)

JACK COOPER TRANSPORT)
COMPANY, INC.,)
Defendant.)

GEN. NO.

17L341

COMPLAINT AT LAW

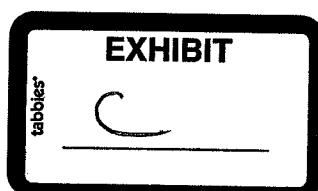
NOW COME the Plaintiffs, BRIAN HORN and ANDREA HORN, by and through their attorneys, AMONI LAW OFFICES, P.C., and in their Complaint against JACK COOPER TRANSPORT COMPANY, INC. states as follows:

Count I: Negligence v. Jack Cooper Transport Co., Inc.

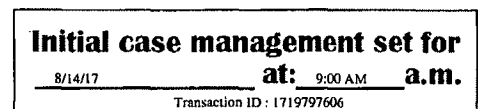
1. On March 16, 2017 at approximately 8:12 a.m., an unknown agent or employee of the Defendant, Jack Cooper Transport Company, Inc., was driving a vehicle in reverse and in the wrong direction of a one way lane within the parking lot area at 2022 Essington Road, Joliet, Illinois, said location being the parking lot for the D'Arcy Motors automobile dealership.

2. On the aforesaid date, time and place, the Plaintiff, Brian Horn, was walking across the lane described above as the Defendant, through its agent or employee, was driving a vehicle in reverse and against the designated direction of vehicular travel.

3. At all times material hereto, it was the duty of the Defendant, through its agent or employee, to operate its motor vehicle with due care and caution for the safety of persons in the parking lot.



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4. The aforesaid duty notwithstanding, on March 16, 2017 at approximately 8:12 a.m., the Defendant's agent or employee, while operating its vehicle as described above, struck the Plaintiff, thereby causing the injuries and damages as hereinafter alleged.

5. On March 16, 2017, the Defendant, by its agent or employee, committed one or more of the following negligent acts or omissions:

- a) failed to keep a proper, or any, lookout for Plaintiff;
- b) operated its vehicle in reverse at a speed that was greater than reasonable and proper given the conditions;
- c) drove its vehicle against the direction of travel designated for the lane of travel in which Defendant was operating its vehicle;
- d) failed to reduce its speed to avoid striking the Plaintiff;
- e) was otherwise negligent and careless in the operation of its motor vehicle.

6. By reason of one or more of the foregoing negligent acts or omissions of the agent or employee of Defendant, Jack Cooper Transport Company, Inc. and as a direct and proximate result thereof, Plaintiff then and there sustained injuries and disability. By reason of said injuries, Plaintiff has suffered pain, and will in the future, continue to so suffer and in endeavoring to become healed and cured of said injuries, Plaintiff was compelled to, and will be compelled in the future, to expend and become liable for sums of money for hospital and related medical care.

7. By further reason of said injuries and as a direct and proximate result thereof, Plaintiff was hindered and prevented from attending to his usual responsibilities and business, and has thereby lost, and will in the future lose, sums of money as wages or profits, and earning capacity, which otherwise would have accrued to him.

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WHEREFORE, the Plaintiff, Brian Horn, prays for Judgment against this Defendant, Jack Cooper Transport Company, Inc. in excess of \$50,000.00, and for costs of suit.

Count II Loss of Consortium

1. At all times material to this complaint, the Plaintiffs, Brian Horn and Andrea Horn, were, and are, lawfully married to one another.

2. On March 16, 2017 at approximately 8:12 a.m., an unknown agent or employee of the Defendant, Jack Cooper Transport Company, Inc., was driving a vehicle in reverse and in the wrong direction of a one way lane within the parking lot area at 2022 Essington Road, Joliet, Illinois, said location being the parking lot for the D'Arcy Motors automobile dealership.

3. On the aforesaid date, time and place, Brian Horn, was walking across the lane described above as the Defendant, through its agent or employee, was driving a vehicle in reverse and against the designated direction of vehicular travel.

4. At all times material hereto, it was the duty of the Defendant, through its agent or employee to operate its motor vehicle with due care and caution for the safety of persons in the parking lot.

5. The aforesaid duty notwithstanding, on March 16, 2017 at approximately 8:12 a.m., the Defendant's agent or employee, while operating its vehicle as described above, struck Brian Horn, thereby causing the injuries and damages as hereinafter alleged.

6. On March 16, 2017, the Defendant, by its agent or employee, committed one or more of the following negligent acts or omissions:

- a) failed to keep a proper, or any, lookout for Brian Horn;
- b) operated its vehicle in reverse at a speed that was greater than was reasonable and proper given the conditions;

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- c) drove its vehicle against the direction of travel designated for the lane of travel in which Defendant was operating its vehicle;
- d) failed to reduce its speed to avoid striking Brian Horn;
- e) was otherwise negligent and careless in the operation of its motor vehicle.

7. By reason of one or more of the foregoing negligent acts or omissions of Defendant, through its agents, actual or apparent, named or unnamed, and as a direct and proximate result thereof, Brian Horn was, and in the future will be, unable and hindered in the performance of his usual duties and obligations and the plaintiff, Andrea Horn, was and will be greatly damaged in the loss of her husband's society, conjugal fellowship, companionship, cooperation and mutual aid in their relationship.

WHEREFORE, the Plaintiff, Andrea Horn, prays for Judgment against this Defendant, Jack Cooper Transport Company, in excess of \$50,000.00, and for costs of suit.

AMONI LAW OFFICES, P.C.

BY: _____


Larry M. Amoni

AMONI LAW OFFICES, P.C.
1975 W. Downer Place, Suite 301
Aurora, IL 60506
Tel: 630/264-2020
Fax: 630/264-2220
IL ARDC#: 43419

2017L000341

LAW DIVISION AFFIDAVIT

LARRY M. AMONI, being first duly sworn on oath, deposes and states as follows:

1. I am the attorney for the plaintiff(s) in this matter and, if called upon to do so, could testify competently to the following.
2. Damages being sought in this cause are in excess of \$50,000.00.



Larry M. Amoni

**ATTESTATION AND VERIFICATION
OF LAW DIVISION AFFIDAVIT**

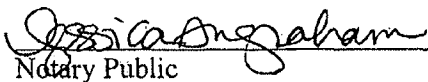
STATE OF ILLINOIS)
) SS
COUNTY OF KANE)

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in the "Law Division Affidavit" are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same as to be true.



Larry M. Amoni
AMONI LAW OFFICES, P.C.
1975 W. Downer Pl., Suite 301
Aurora, IL 60506
Tel: 630/264-2020
Fax: 630/264-2220
ARDC # 43419

SUBSCRIBED AND SWORN TO
before me this 25 day of
April, 20 17.


Notary Public



[EXTERNAL] Notice of Service of Process - Transmittal Number: 16603464

From: sop@cscinfo.com
Date: 5/8/2017 9:10:09 AM
To: Josh Humphries;
Cc:
Attachments:



CORPORATION SERVICE COMPANY™

NOTICE OF SERVICE OF PROCESS

Transmittal Number: 16603464

(Click the Transmittal Number to view your SOP)

Pursuant to client instructions, we are forwarding this summary and Notice of Service of Process.

Entity: Jack Cooper Transport Company, Inc.
Entity I.D. Number: 0193822
Entity Served: Jack Cooper Transport Company, Inc.
Title of Action: Brian Horn vs. Jack Cooper Transport Company, Inc.
Document(s) type: Summons/Complaint
Nature of Action: Personal Injury
Court/Agency: Will County Circuit Court, Illinois
Case/Reference No: 2017L000341
Jurisdiction Served: Illinois
Date Served on CSC: 05/05/2017
Answer or Appearance Due: 30 Days
Originally Served On: CSC
How Served: Personal Service

Sender Information:

Larry M. Amoni
630-264-2020

Primary Contact:

Theo A. Ciupitu
Jack Cooper Transport Company, Inc.

Electronic copy provided to:

Katie Helton Esq.
Josh Humphries
David Thatcher
Jordan Stringer

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the document (s) and taking appropriate action.

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EXHIBIT

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2017L000341

IN THE CIRCUIT COURT OF THE TWELFTH JUDICIAL CIRCUIT
WILL COUNTY, ILLINOIS

BRIAN HORN and ANDREA HORN

VS

CASE NO: 17L341

JACK COOPER TRANSPORT COMPANY, INC.

SUMMONS

To each defendant: Jack Cooper Transport Company, Inc. c/o Illinois Corporation Service C
801 Adlai Stevenson Dr., Springfield, IL 62703

You are summoned and required to file an *answer in this cause, or otherwise file your *appearance in the Office of the Clerk of this
Court Will County Courthouse Building, Room

14 W. Jefferson Street, Joliet, Illinois within 30 days after service
(Address and City)

of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGEMENT OR DECREE BY DEFAULT MAY BE TAKEN
AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if
any, immediately after service. If service cannot be made, summons shall be returned to endorsed.

This summons may not be served later than (30) days after its date.



WITNESS: APRIL 25, 2017

Andrea Lynn Chasteen
Clerk of the Circuit Court

(Plaintiff's Attorney or Plaintiff if he is not represented by an Attorney)

NAME: Larry M. Amoni

ARDC# 43419

Attorney for Plaintiffs

Address: 1975 W. Downer Pl., Suite 301

City: Aurora, IL 60506

Telephone: (630) 264-2020

*The answer and/or Appearance filing fee is based upon the dollar amount of said case.

ANDREA LYNN CHASTEEN, CLERK OF THE CIRCUIT COURT OF WILL COUNTY

16F (Revised 03/17)